

RCCI Manual

Child Nutrition Program Guidance
for
Indiana Residential Child Care Institutions



FORWARD

This manual contains information for Residential Child Care Institutions (RCCIs) which either participate or would like to participate in the National School Lunch Program (NSLP), and/or the School Breakfast Program (SBP), or the Special Milk Program (SMP). Since numerous procedures are unique to RCCIs, we felt that it would be helpful to incorporate regulations, instructions, and guidance into one manual for easy reference.

All School Nutrition Programs (SNP), including NSLP, SBP, and SMP, are administered by a State Agency (SA), which in our state is the Indiana Department of Education, School and Community Nutrition Programs. You are encouraged to contact the SA with your questions or for on-site technical assistance.

This manual is based on information developed by the Indiana Department of Education, School and Community Nutrition.

Indiana Department of Education
School and Community Nutrition
151 West Ohio Street
Indianapolis, Indiana 46204-2798
(317) 232-0850
(800) 537-1142
FAX (317) 232-0855

CONTENTS

| | | |
|--|--|------------|
| Introduction..... | 4 | |
| History and Purpose, Applicable Regulations, Common Acronyms | | |
| General Program Requirements | 6 | |
| Qualifications of the Institution | | |
| Agreement/Application with the State Agency | | |
| Policy Statement | | |
| Civil Rights | | |
| Wellness Policy | | |
| Children’s Free and Reduced Price Eligibility..... | 9 | |
| Institutionalized Children | | |
| Day Students Attending RCCI | | |
| Menu Planning | 13 | |
| Meal Requirements for lunch, breakfast, snacks | | |
| Offer vs Serve | | |
| Family Style Meals | | |
| Portion Sizes | | |
| Food Production Records | | |
| Food Distribution..... | 17 | |
| Eligibility, Delivery, Inventory, Receiving, Damages, Complaints | | |
| Procurement..... | 21 | |
| Small Purchases, Competitive Bids | | |
| Financial Management | 24 | |
| Recordkeeping | | |
| Specific Prohibitions | | |
| Reimbursement | | |
| Meal Counting and Claiming Procedures | 27 | |
| Point of Service and Check-off lists | | |
| Weekend Reimbursement, RCCI Sack Lunches Sent to Schools | | |
| Non-Reimbursable Meals | | |
| Recording and Reporting for Reimbursement | | |
| Internal Controls: Edit Checks, Monitoring | | |
| State Agency Reviews | 30 | |
| CRE – Coordinated Review Effort | | |
| SMI – School Meals Initiative | | |
| Appendices: <i>most are also online</i> | 31 | |
| A | Calendar of Due Dates | |
| B | Statement of Facts | not online |
| C | Eligibility Roster | not online |
| D | Dietary Guidelines | |
| E | Menu Plans - Lunch | |
| F | Menu Plan – Breakfast | |
| G | Menu Plan – Snacks | |
| H | Offer vs Serve | |
| I | Production Record / Instructions | |
| J | Menu Planning Tips | not online |
| K | Meal Count Check-off List / Instructions | not online |
| L | Edit Check / Instructions | |
| M | Food Cost Example | not online |
| N | Temperature Chart | not online |

INTRODUCTION

History

Since 1946, the National School Lunch Program has provided financial support and federally purchased commodities to help schools serve nourishing, well-balanced meals to children. The Child Nutrition Act of 1966 expanded the program to include breakfast. Of particular importance is the amendment to the National School Lunch Act in 1975 which extended eligibility to include residential child care institutions (RCCI's).

Purpose

The purpose of all Child Nutrition Programs is stated as policy in the National School Lunch Act:

It is hereby declared to be the policy of Congress, as a measure of national security to safeguard the health and well-being of the Nation's children and to encourage the domestic consumption of nutritious agricultural commodities and other food, by assisting the States, through grants-in-aid and other means, in providing.....for the establishment, maintenance, operation, and expansion of non-profit school lunch programs.

The benefits of sponsoring School Nutrition Programs (SNP) such as the National School Lunch Program (NSLP) and School Breakfast Program (SBP) in the RCCI facility include cash reimbursement for breakfasts, lunches and snacks planned according to nutritionally adequate meal patterns and served to eligible students, as well as the provision of USDA donated food assistance (commodities) through the Food Distribution Program (FDP).

Applicable Regulations

Regulations which are pertinent to the operations of the School Nutrition Programs in an RCCI are 7 CFR: Part 210, Part 220, Part 250, and Part 3015. All regulations are available on the School Nutrition page of our website: www.doe.in.gov/food.

7 CFR - Title 7 Code of Federal Regulations

7 CFR Part 210, National School Lunch Program (NSLP) - Sets forth the requirements for participation in the NSLP. It specifies program responsibilities of State and local officials in the area of program administration, preparation and service of nutritious lunches, payment of funds, use of program funds, program monitoring and reporting and recording requirements.

7 CFR Part 220, School Breakfast Program (SBP) - Sets policies and prescribes regulations necessary to carry out the provisions of Section 4 of the Child Nutrition Act of 1966, as amended, which authorizes payments to the states to assist them to initiate, maintain or expand nonprofit breakfast programs in schools and RCCIs.

7 CFR Part 250, Donation of Foods for Use in the United States - Sets forth the terms and conditions under which donated foods may be obtained from the USDA for use in the Child Nutrition Programs.

7 CFR Part 3015 - The uniform Federal assistance regulations published by the USDA to implement Office of Management and Budget circulars A-21, A-87, A-102, A-110, A-122 and A-128.

Common Acronyms used in the Child Nutrition Programs

| | | |
|--------|---|--|
| ADA | = | Average Daily Attendance |
| ADP | = | Average Daily Participation |
| CFR | = | Code of Federal Regulations |
| CNP | = | Child Nutrition Programs (all nutrition programs funded via USDA) |
| CNPweb | = | Child Nutrition Programs online reporting system |
| CRE | = | Coordinated Review Effort (review of claims procedures) |
| DOE | = | Department of Education |
| FDP | = | Food Distribution Program |
| FNS | = | Food and Nutrition Service (USDA) |
| LEA | = | Local Education Agency |
| NSLP | = | National School Lunch Program |
| OvS | = | Offer versus Serve |
| RCCI | = | Residential Child Care Institution |
| SA | = | State Agency (DOE) |
| SBP | = | School Breakfast Program |
| S&CN | = | School and Community Nutrition (at DOE) |
| SFA | = | School Food Authority |
| SMI | = | School Meals Initiative (nutrient analysis review) |
| SMP | = | Special Milk Program |
| SNP | = | School Nutrition Programs (Lunch, Breakfast, Snacks, Special Milk) |
| USDA | = | United States Department of Agriculture |

GENERAL PROGRAM REQUIREMENTS

Qualifications of the Institution

RCCIs can receive full benefits of School Nutrition Programs provided that the institution:

- 1) is public or nonprofit private;
- 2) operates principally for the care of children;
- 3) is residential;
- 4) if private, is "tax exempt" under Section 501(c)(3) of the Internal Revenue Code of 1954;
- 5) if private, is licensed by the State to provide residential child care.

A public institution is one which is operated by and primarily responsible to any level of Federal, State or local government. A private, nonprofit institution is one which is not public and is tax-exempt for federal income tax as described above.

Institutions qualifying as an RCCI eligible for full benefits include, but are not limited to:

- homes for the mentally retarded, emotionally disturbed, physically handicapped or unmarried mothers and their infants;
- group homes;
- halfway houses;
- orphanages;
- temporary shelters for abused and/or runaway children;
- long-term care facilities for chronically ill children;
- juvenile detention centers.

NOTE: Boarding schools are **not** considered to be RCCIs.

States may not impose any additional eligibility requirements. Of course, as with schools currently participating, inability to comply with program regulations would disqualify an institution from participation.

Agreement with the State Agency (SA)

To become a sponsor of NSLP and SBP you must request an agreement from the SA. The first year can start at any time, but there is an annual renewal process after that effective every year on July 1. The agreement, which includes sponsor and site applications, a Policy Statement, and Civil Rights information sets forth the terms, conditions, and covenants necessary to comply with government regulations of the programs. When the RCCI administration is convinced that the responsibilities can be correctly executed, the agreement is signed by the RCCI Director and returned to the SA for consideration. It is signed at the state level, thus becoming the agreement or legal, binding contract. A copy of the signed agreement is returned to the RCCI. It is the responsibility of the RCCI administrative staff to oversee the programs to assure that they are carried out successfully within the framework of the contract. It is imperative that food service employees in administrative and supervisory capacities become familiar with this document and with the Policy Statement.

Policy Statements for Non Pricing Institutions

All RCCIs participating must have a policy statement. Pricing programs (where children pay for the meals) most often found in schools, require a lengthy policy statement as outlined in 7 CFR Part 245.10. Non pricing programs, such as found in most RCCIs, may have a simplified version of the required policy statement. To qualify as a non pricing program, RCCIs may not charge children for any meals served.

Any policy statement for non pricing programs must contain the following: (1) that the entire enrollment is being served the same meal at no charge and without discrimination against any child in the course of the meal service. The suggested form will be sent to new sponsors. For continuing sponsors, it is on the CNP web™ in the Sponsor Summary Packet list.

Questions about policy statements

1. Q: In RCCIs with non pricing situations, is the RCCI required to reduce tuition, board or other fees paid by the parents of children who qualify for free or reduced price benefits by the amount of the benefits they would have received in a pricing situation?

A: No, RCCIs operating non pricing SNPs are not permitted to administer such a price reduction.

2. Q: Are the requirements for submitting a policy statement different for RCCIs with students who attend an RCCI during the day, but do not reside in the institution?

A: Yes. RCCIs with day students in attendance must submit the Pricing policy statement as for any regular school. No public release is needed.

Food Safety

The National School Lunch Act requires that two food safety inspections per school year be conducted by the State or local governmental agency responsible for inspections. All sponsors of National School Lunch Programs should request these from their local county health department and keep documentation of the request. More details on this requirement are on our website home page www.doe.in.gov/food.

Wellness Policy

Legislation places the responsibility of developing a wellness policy at the local level, so that the individual needs of each school district can be addressed. According to the requirements for the Local Wellness Policy, school districts must set goals for nutrition education, physical activity, campus food provision, and other school-based activities designed to promote student wellness. This requirement also applies to RCCIs. For more information, see our website home page: www.doe.in.gov/food.

CIVIL RIGHTS

Any materials disseminated by an RCCI regarding the School Meal Programs such as the free and reduced price meal application for Day Students, must include the following statement:

Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly. In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write to *USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington DC 20250-9410* or call 800-795-3272 (voice) or 202-720-6382 (TDD). USDA is an equal opportunity provider and employer.

Children should not be required to use a separate dining area, go through a separate serving line, enter the dining area through a separate entrance or consume their meals at a separate time based on their race, sex, color, national origin, age, or disability.

RCCIs must also have on file data on the racial/ethnic makeup of the children applying and participating in the School Meal Programs. The method of collecting data can be developed by the RCCI. Methods include observation, personal knowledge or voluntary self-identification by the applicant.

The “*...And Justice for All*” nondiscrimination poster must be displayed prominently where participating children can see it. The poster can be obtained by contacting our office. Annually at least one person at the sponsor level must take the online Civil Rights Training and in turn provide the training to the food service employees. See our website for access to the training site: www.doe.in.gov/food

Common Questions about Civil Rights

Q. Is it necessary for an RCCI to be accessible to children with disabilities?

A. Regulations state that all Child Nutrition Programs must be accessible to children with disabilities. However, structural alterations are not required for participation in any Child Nutrition Program. Therefore, an RCCI need not make structural alterations to its facilities to accommodate an individual. The RCCI should work towards making its facilities accessible to all and, until that time, refer children to facilities that are properly equipped.

Q. If I get a civil rights complaint, how do I handle it?

A. A civil rights complaint form is available on the Department of Education website.

Calendar of Due Dates

For all sponsors on any of the School Nutrition Programs, there are several items to be completed during each year. See Appendix A for the list of due dates for those things most applicable to RCCIs.

CHILDREN'S FREE AND REDUCED PRICE ELIGIBILITY

Once the eligibility of the RCCI has been established, it is necessary to establish the eligibility of the children participating at the RCCI. RCCIs must maintain the names, ages (must be under 21 years of age) and entry and departure dates of all participating children in the NSLP and SBP.

We have separated the eligibility requirements for institutionalized children from those of day students because the requirements vary substantially between them.

Institutionalized Children

An institutionalized child is considered as a one-person household since he/she is not living with his/her actual family as an economic unit. The RCCI need not obtain an application or signature from an adult household member. Since an institutionalized child is defined as a family of one, program eligibility for institutionalized children is based on income received by the child; the family's income is not included. **Payments from any source directly received by the institution on a child's behalf are not considered as income to the child. Only the income a child earns from employment and/or personally receives while in residence at the institution is considered as income.** As a result, meals for most institutionalized children can be claimed as free because the children's personal income falls well within the free eligibility guidelines.

In order to properly document the eligibility of institutionalized children, an RCCI may use one of the following methods:

- A. **The Statement of Facts** - The simplest method of documenting children's eligibility is to have a signed Statement of Facts on file at the RCCI. This is a written statement outlining the general policy or condition within the RCCI which would cause all its institutionalized children (not including day students) to be eligible for free benefits. A prototype form is included in Appendix B. The following are some acceptable examples of what would qualify as Statement of Facts:

Example 1: "All our children are wards of the court. They are not permitted to earn, receive or retain any money while in our custody."

Example 2: "Our students are permitted to hold part-time jobs (up to 16 hours per week). The maximum earnings we have seen have been \$83.00 per week. We also permit students to get up to \$5.00 per week from home, but require any money received or earned to be turned in to our 'bank' and to be drawn out only with permission."

- B. **Eligibility Roster** - If an RCCI does not have a predetermined policy which dictates the allowable income to children; then it may wish to record eligibility determinations, by child, on a list. A sample eligibility roster is included in Appendix C. It must contain the following information:

- child's name;
- date of eligibility determinations;
- category of eligibility; and
- approving official's signature/initials

Day Students Attending RCCI

Day students are children who attend, but do not reside in an RCCI. A student's eligibility for free, reduced price or paid meal benefits is determined based on the student's household size and income or Food Stamp/TANF participation. A Statement of Facts does **not** cover the eligibility of day students as it does for the institutionalized children.

To determine a day student's eligibility in the program, RCCIs must obtain documentation of his free and reduced price status from the regular school of attendance or have the child's family apply with your facility. Free and Reduced Applications are available on our website or call us for assistance.

For Categorical Eligibility Based on Food Stamp and/or TANF Information:

- name of the child for whom application is made;
- food stamp or TANF case number for the child for whom application is made; and
- signature of an adult household member.

For Eligibility Based on Household Size and Income:

- names of all household members;
- amount and source of income received in the prior month by each member;
- social security number of the adult household member who signs the application or an indication that the household member does not have one; and
- signature of an adult household member.

Day students from households currently certified to receive Food Stamp/TANF assistance are categorically eligible for free benefits. If a household does not receive such benefits, then reported income must fall within Federal eligibility guidelines to entitle a child to free or reduced price meal benefits.

There are a variety of methods to document the required eligibility information of day students. It is critical that any method used must contain the information outlined above. The following lists some options for documenting the eligibility of day students.

- A. **Free & Reduced Price Applications** - A free and reduced price application may be used to determine eligibility for meal benefits. Usually day students are already enrolled at a regular school and if eligible, should have an approved application on file there. RCCIs may request a copy of the approved Free and Reduced application from the school.

For other day students not coming from a regular school, prototype free and reduced price applications which contain all required language and instructions as well as the required parent letter can be obtained online at www.doe.in.gov/food. Applications must be made on a per household basis. The RCCI can mail the applications home to all the households or send them home with the day students. The RCCI must review applications, make eligibility determinations, complete Verification and other requirements in relation to processing applications that traditional schools follow.

- B. **Eligibility Roster** - As mentioned in the previous section, this records the names of all children in the RCCI along with the appropriate eligibility information. Please note that although one Eligibility Roster can be used for both institutionalized children and day students, the eligibility and documentation requirements differ between the two groups. Care should be taken to ensure that the eligibility requirements are met for both institutionalized children and day students. The Eligibility Roster does not document the eligibility of students, but records the eligibility of students for free and reduced price benefits.

Verification

RCCIs are exempt from verification efforts **except for applications of any day students** attending the institution that are not also part of a regular school's enrollment. Please check with your SA for specific verification requirements and procedures.

Questions about eligibility

1. Q: Are residential institutions which operate only on weekends eligible for participation in the SNPs?

A: No. It is the intent of the law that a residential institution provide continuous child care service. Since an institution operating only on weekends is not open continuously, it is not eligible to participate.

2. Q: When an institution maintains only a portion of its membership in residence and another group of children attend daily but reside elsewhere, is it eligible to participate in the SNPs?

A: Yes, the primary basis for eligibility of an institution to participate is its residential status. As long as some children reside in the institution, it is considered residential and eligible to participate. However, any children **under** age 21 who participate in the institution's program may receive full program benefits in the SNPs regardless of whether they reside at the institution.

3. Q: When adults are also in residence in the institution, must children reside in a physically separate unit or wing within the institution?

A: It is the intent of the regulations to serve children who reside in an institution which is designed and operated primarily for the care of children or in a separate children's wing or in an identifiable area of an institution. As such, even though an institution primarily serves and cares for adults, the regulations have been written to allow these types of institutions to participate if the residing children are located in a distinct part of the institution designed primarily for the care of children.

4. Q: Are RCCIs, such as, runaway shelters that have temporary clientele, eligible for participation in the SNPs?

A: As long as the institution itself operates on a continuous basis, it can participate in the SNPs. Due to the short-term services these types of institutions provide, it is of the utmost importance that complete records be maintained for three years to document claims. Such records should clearly illustrate in sufficient detail, by type of meal (breakfast or lunch), that all meals served on any given day and claimed for reimbursement were eligible for such reimbursement. Careful records of entrance and exit dates of each resident and their eligibility category during their stay must be kept.

5. Q: Are homeless shelters that house both adults and children and do not physically segregate out the children from the adults eligible to participate in the SNPs?

A: No, homeless shelters which cannot demonstrate a primary mission of service to children or which permit families to reside together are not eligible to participate as RCCIs. However, children are eligible to participate in the Special Milk Program (SMP) as "settlement houses" and claim milk served to children. Contact your SA for details.

6. Q: If a child who resides in an RCCI attends a traditional school during the day, how is an eligibility determination made for the child at the day school?

A: To apply for free and reduced price benefits at the day school, the RCCI must submit to the day school an application on behalf of the child. A complete application for an institutionalized child must include:

- a) the child's name;
- b) the child's personal income (money earned or received in hand) and how often it is received;
- c) signature of an adult from the RCCI.

The day school would then review the application based on the household size and income reported. A list of residents provided to the school by the RCCI is not sufficient.

7. Q: When a correctional facility serves as an RCCI, what is the definition of separate areas for inmates under twenty-one?

A: If inmates that are eligible for the SNPs reside on one side of a corridor with non-eligible inmates on the opposite side, the distinct or separate wing or identifiable area requirement is satisfied. If there is an "under twenty-one" corridor or wing, then the requirement is satisfied.

MENU PLANNING

Meals served in the NSLP should always be nutritious, well-balanced and designed so that, over a period of time, they will provide children with approximately one-third of the nutrients they need according to the Recommended Dietary Allowances. They should also conform to the USDA Dietary Guidelines for Americans – see Appendix D.

We have also included in Appendix E, F, and G, the Menu Plans and meal requirements for **School Lunch**, **School Breakfast**, and the **Afterschool Snack Program**. These charts list the food components and the minimum quantities required, by age/grade groups, for complete, reimbursable meals. The Traditional Food-Based Menu Plan has been around since 1946 with a few modifications over the years. In 1995 the Enhanced Food-Based Menu Plan was introduced. The main differences between these two are the grouping of age/grade levels and the amount of grains/breads servings required per week.

There is another option for planning menus based on nutrients or Nutrient Standard Menu Planning (NSMP) – this one requires use of USDA-approved computer software to plan the menus. Or, there is the option for hiring an outside entity to plan nutrient-based menus with the USDA-approved computer software – this is called Assisted NSMP.

Meal Requirements: National School Lunch Program

For the Lunch Program, there are special requirements concerning the minimum weekly grains/bread requirement. The Traditional chart specifies the minimum requirement for bread is 8 servings per week. However, the 8 servings are based on a 5 day week usually found in schools. RCCIs serving lunch 6 or 7 days a week should increase the 8 servings by approximately 20% for each additional day. For the Enhanced menu plan, the number of servings would also be increased about 20% for each additional day.

For both food-based plans, a complete lunch consists of five different items from four food components.

FOUR COMPONENTS

Meat/Meat Alternate-----

Vegetable/Fruit-----

Grains/Bread-----

Fluid Milk-----

FIVE FOOD ITEMS

Meat/Meat Alternate

Vegetable/Fruit*

Vegetable/Fruit*

Grains/Bread

Fluid Milk

* Reimbursable lunches must provide two food items from the vegetable/fruit component and one food item from each of the other three food components.

| SAMPLE LUNCH MENU | FOOD ITEM | FOOD COMPONENT |
|--------------------------|-----------------------------|-----------------------|
| Toasted Cheese Sandwich: | Cheese | Meat/Meat Alternate |
| | Bread | Grains/Bread |
| Tossed Salad: | Lettuce, Tomatoes & Carrots | Vegetable/Fruit |
| Banana: | Banana | Vegetable/Fruit |
| Milk: | Milk | Milk |

Meal Requirements: School Breakfast Program

A complete breakfast consists of four food items from the four food components, as follows:

You must serve one of the following possible combinations of the four food items:

| | | |
|---------------------|---------------------|------------------|
| | OR | OR |
| Meat/Meat Alternate | Meat/Meat Alternate | Grains/Bread |
| Grains/Bread | Meat/Meat Alternate | Grains/Bread |
| Vegetable/Fruit* | Vegetable/Fruit* | Vegetable/Fruit* |
| Fluid Milk | Fluid Milk | Fluid Milk |

* The vegetable/fruit component may be a fruit, vegetable or full-strength vegetable or fruit juice.

The Traditional and Enhanced breakfast meal plans are identical so select the one that goes with the plan chosen for lunch. The Traditional Plan is in Appendix F.

Offer versus Serve (OvS)

Offer versus Serve (OvS) regulations were introduced in 1975 to reduce the amount of plate waste in the NSLP. OvS allows children to choose a specified minimum number of food items from those offered. These regulations mandate that the OvS provision be implemented in institutions serving students of a high school grade level as defined by the State. However, this provision is optional in RCCIs for any grade level because it may be difficult to administer OvS to institutionalized children, particularly when there are special circumstances such as special diet or security concerns.

Nevertheless, in certain institutions where it is desirable, officials may wish to offer this option. In RCCIs implementing OvS in their lunch program, children **must be offered** all **five** food items. High school age children must choose at least full portions of **three** of the five items offered.

Children below high school level in RCCIs with OvS must take at least **three or four** (at the RCCI's option) of the five food items offered.

RCCIs which have OvS in their breakfast programs must offer all **four** food items to all children. Children then have the option to choose at least **three** of the four items offered.

Sample OvS menus have been included in Appendix H.

Family Style Meals

If your facility serves family style meals, food items must be placed on the table in sufficient quantities to provide at least the minimum portions of the components for all the children at the table and to accommodate any adults supervising the meal service who are eating with the children.

The required amount of each food item must be served to each child. When the full portion has not been served to a child initially, supervising adults must assume the responsibility of actively encouraging the child to accept service of the full portion during the course of the meal.

If an RCCI has both a family style meal service and is implementing OvS, once a child has taken at least the minimum portions of the required food items, then he/she may also take less than the minimum quantity of other food items.

Food Production Records

You must prepare food production records and retain them on file to document that meals claimed for reimbursement meet the quantity and component requirements. The SA does not require a specific form, but the form should contain all the same information as the suggested sample in Appendix I. The food production records should show the quantities of food prepared (in cans, lbs, servings, etc.) and left over each time reimbursable meals are served. The record should also include a space for other pertinent information about the day's production, such as overproduction due to circumstances beyond the manager's control, and comments on acceptance of each menu item. These records then become a valuable planning tool, since you can use them to help estimate the amount of each menu item to prepare the next time it is served.

If properly implemented, OvS should reduce food waste, since children would not be forced to accept food they do not wish to eat. The reduction of food waste may not be achieved, however, unless managers take care to avoid overproduction. To ensure proper planning for OvS, managers will need to keep accurate daily records of food production for each menu item.

Varying Portion Sizes

Determining Portion Sizes - We encourage staff at RCCIs to serve quantities of foods based on their residents' nutritional needs, which vary with age. Review the ages of your residents and refer to the Meal Pattern Requirements chart in Appendix E, F, or G for guidance. If you adjust portions, the amounts are the minimum requirements for the ages or grade levels specified. If the RCCI is restricted to serving the same quantities to all children, the minimum portion size must be that required for the highest age group. Note that the ages of some children may not necessarily correspond to the grades outlined in our charts.

- Determine the ages of children at your facility. For instance, where the ages of residents range from five to nine, the RCCI should serve Group III and Group IV portion sizes, if possible, on the Traditional Menu Plan. Otherwise, it must serve Group IV portion sizes.
- The quantities of foods for Groups I and II are minimums. RCCIs must **never** serve less than

these minimum quantities to children ages four and under. Since children of this age group can only manage small quantities of food at one time, RCCIs are encouraged to offer lunch at two serving periods which, when combined, will meet the total minimum quantities. For example, you could serve juice and toast at 10:00 a.m., and the meat, vegetable and milk at noon. RCCIs must obtain approval from the state if two distinct serving periods are used in these situations.

Meal Requirements: Afterschool Snack Program

To be eligible for this program, the RCCI must offer education or enrichment activities in an organized, structured and supervised environment AFTER school. It must be stressed that this would be available to ALL resident children of the RCCI.

The snack meals may only be claimed on days when the child went to school whether on-site or at another regular school. This is different than lunch and breakfast, which may be claimed on all days of participation. There must also be a way to determine that children are present on a given day, such as having a roster or sign-in sheet for the snack program.

See Appendix G for the snack meal requirements. Production records are required to provide documentation of meal pattern compliance. It is also recommended that the RCCI review the after-school care program two times a year to insure compliance.

Questions about menu planning

1. Q: How can food substitutions be made for medical, dietary or religious reasons?

A: Certain alterations for medical or dietary reasons may be made with a written statement from a doctor or other recognized medical authority, which recommends substitutions for the required items. Alterations may also be made for religious reasons, if nutritionally sound and approved by the USDA's Food & Nutrition Service. A statement for each child should be on file explaining who made the request and how it was determined that granting the special meal pattern was in the child's best interest. If substitutions are for the RCCI as a whole, only one statement is necessary.

2. Q: Can RCCIs serve pitchers of milk placed on tables in the eating area (beyond the serving line) and be in compliance with the meal requirements?

A: RCCIs may choose to have pitchers of milk on the table and allow children to serve themselves; however, they must take extreme caution to ensure all meals are reimbursable. Glasses of sufficient size to meet the quantity requirement should be provided. For example, for children in Group III and IV (8 oz. requirement), a 10 oz. glass must be used to ensure that the minimum requirement is met.

FOOD DISTRIBUTION PROGRAM

Eligibility for USDA Foods

New sponsors are not eligible for USDA Foods until they have been on the National School Lunch Program (NSLP) for one school year.

USDA Foods are purchased by the government to improve the nutritional status of children and offered to RCCIs based on NSLP participation.

The annual USDA Planned Assistance Level (PAL), often referred to as Entitlement, is distributed via the CNPweb™ system to eligible sponsors each year on an annual pre-order survey. The PAL is based on student participation in the NSLP the previous school year. In December or January, each school year, sponsors complete an online pre-order survey that indicates each sponsor's need for the types and amounts of USDA Foods they wish to receive beginning the following August.

Delivery of USDA Foods

Frequency of Deliveries - The warehouse contractor will, by August 1, upload available delivery periods into the CNPweb™ system. Delivery requests must be completed through the CNPweb™ system.

Deliveries to recipient agencies shall be made on a biweekly basis or with the mutual agreement of both parties at other intervals. Those recipient agencies affected by any deviation from the published schedule shall be notified by telephone as soon as the deviation is recognized by any agent of the contractor (i.e., delivery personnel). Biweekly delivery means every other week and **not** twice a month; therefore, recipient agencies may have deliveries scheduled three times in certain months.

Delivery Times - Deliveries shall be made between the hours of **7:00 a.m. and 3:00 p.m. (Recipient Agency Local Time)**, unless special arrangements are made in advance. Deliveries shall be made Monday through Friday, except holidays or other times when certain recipient agencies are closed such as for inclement weather.

The contractor shall, **where practical**, provide each recipient agency with delivery on the same weekday of each scheduled delivery period or provide a 24-hour notification of delivery. This provision should actually increase delivery efficiency by enabling recipient agencies to plan and schedule receiving personnel.

In the event that deliveries are delayed due to a cause beyond the control of the recipient agency (i.e., inclement weather, contractor equipment failure, or personnel problems), the contractor shall work with the affected recipient agency to arrange another agreeable time of delivery before the next scheduled delivery date.

When requested, the contractor must provide delivery to all recipient agencies. Delivery may be arranged during the month of July **only** after inventory reconciliation has been completed and the Using Agency (IDOE) has cleared all products for delivery and/or transfer. The contractor shall make every effort to ensure that deliveries are completed as scheduled on a biweekly delivery basis. Non-school Summer Food Service Program sponsors will place orders through the CNPweb™ system.

Delivery Drops - Drivers and/or other representatives of the contractor shall deliver USDA Foods into designated receiving areas at each recipient agency site and shall not be required to stow such USDA Foods on shelves.

Single Inventory Record Keeping System

Indiana, like many other states, has adopted the single inventory approach to receiving, storage and utilization of USDA Foods. Once a USDA Food item appears in a sponsor's CNPweb™ inventory, it is considered to be commercial product regarding delivery, receiving, storage and utilization. The single inventory recordkeeping system combines purchased food and USDA Foods purchased for the School Nutrition Programs into one system. USDA's decision to purchase and distribute USDA Foods in commercial labels rather than USDA labels created a need to change inventory procedures. Since USDA Foods would be visually indistinguishable from purchased food, maintaining separate inventories for the two classes in order to facilitate compliance with existing regulations would be difficult. Therefore, USDA granted states a waiver from certain regulatory requirements. States that adopted the single inventory system, and SFAs under their oversight, were instructed to apply the same recordkeeping and inventory requirements to USDA Foods that they use to safeguard foods purchased with School Nutrition Program funds.

Handling USDA Foods under the Single Inventory Record Keeping System -

1. The value of the USDA Food will be realized when title passes to the SFA. At that point, the product becomes the property of the SFA and is a nonprofit food service account asset.
2. Since separate inventories are no longer required, the same inventory valuation method currently used by the SFA for purchased products would now apply to all USDA Foods. For example, if the SFA uses FIFO (first in-first out) for purchased products, the SFA would use FIFO for its USDA Foods.
3. The SFA will treat and safeguard its USDA Foods just as it now does with supplies purchased with nonprofit food service account funds. As always, good inventory management and control practices must be maintained.
4. The SFA may use the USDA Foods across programs as long as all income accrues to the nonprofit food service account in the same manner income currently accrues from the use of supplies purchased with nonprofit food service account funds.

5. When a loss of a USDA Food occurs after title has transferred, the SFA is required to use the same procedures currently in place for reporting purchased product losses. If the SFA is not obligated to report purchased product losses to the State agency, the SFA will no longer be responsible for reporting USDA Food losses. However, the SFA remains responsible for ensuring that all nonprofit food service resources are safeguarded and reminded that any misuse of nonprofit food service resources is subject to criminal prosecution under section 12(g) of the National School Lunch Act.
6. USDA Food entitlement credit will be available to SFAs that furnish food for nationally declared disaster feeding. The credit cannot exceed the lesser of the actual USDA Foods supplied or the amount of the USDA Foods received during the past 12 months.
7. Once received by the SFA, the State agency will not be involved in arranging or accounting for transfers to other agencies. Transferring of USDA Foods may still occur, however, arrangements will be made at a local level. Since the value of the USDA Food has already been realized by the SFA, no additional entitlement will be credited. It will be the responsibility of each SFA to recoup the transferred product value.
8. Food safety recalls will follow the current USDA Hold and Recall procedures. As with any commercial product, can codes and establishment numbers will be used.
9. Since not required on commercial labels, the pack date will be lost. As you know, this information was the basis for “Best if Used by Dates” guidance. This guidance will no longer be made available; therefore SFAs are reminded to maintain good inventory practices.

Receiving

Designated receiving areas have the following parameters:

1. Delivering carriers shall have access to a ground level unloading area or standard truck dock.
2. Facilities shall be accessible by truck.
3. Final receiving areas shall be on the same level as the unloading area and no more than fifty feet from ground level unloading area or truck dock.
4. Carriers will follow standard industry practice pertaining to deliveries when addressing unusual delivery situations. A recipient agency representative shall verify accuracy of items, quantities, and condition of USDA Foods. The recipient agency representative must sign each delivery receipt. The receiving agent shall note variances from the norm, such as shortages, damages, etc., on the appropriate delivery receipt. Delivery personnel shall initial all such notations.
5. A recipient agency delivery order of fewer than ten cases per drop site will be assessed a drop fee not to exceed fifteen dollars per drop. A drop fee **may not** be assessed when delivery of less than the minimum is the result of the contractor's discretion. As an example, if a single

recipient agency requested a combined delivery of dry and cooler/freezer USDA Foods which met the minimum delivery requirement and the contractor decided to deliver less than the minimum of dry USDA Foods on one day and less than the minimum of cooler/freezer USDA Foods several days later, the recipient agency would not be subject to the drop fee.

Damages and Shortages

The sponsor should approach these issues for USDA Foods just as they would for any commercially purchased product. Under the single inventory system, your first contact would be the distributor. Be sure that all such incidents are noted on the delivery document and initialed by the delivery agent. The distributor will post a USDA Food short delivery in the CNPweb™ system and the sponsor will need to reorder the product.

USDA Food Complaints

When a sponsor can clearly identify that there is a problem with a USDA Food product they may file a complaint with the State agency and USDA. A Complaint Form is available from the State agency and is used to report unfit USDA Foods to the State agency. A sponsor may also call USDA directly at 1-800-446-6991. This process helps USDA maintain a system that provides only USDA Foods from the best sources. When placing a call to the USDA Foods Complaint Hotline or emailing the State agency, it would be very helpful if you could provide the following information:

- The name of the product and a full description of the USDA Food item (e.g., Mixed Fruit – A300). A product code may not be available. The date of allocation would be very helpful.
- The nature of the problem and whether anyone reported feeling sick from consuming the product.
- The extent of the problem (e.g., the number of cases, pounds, truckloads, etc.).
- The specific circumstances involved (e.g., I received the damaged canned products two months ago but the case they were packed in was located in the middle of a pallet that could not be seen until it was opened by the school.)
- Each location where the product is being stored.
- Delivery order information including: date product received, contract number, notice of delivery number, lot number, and can codes (if applicable).
- In some instances, photographs of the damaged product might be helpful. Our customer service representative will discuss the issue with the sponsor as needed.

PROCUREMENT

The requirements as set forth in USDA regulations for each program are similar in scope. The parameters of all programs revolve around 7 CFR Parts 3016 & 3019. The program regulations that outline the basic requirements for procurement are: 7 CFR Part 210.16(b) & (c); 7 CFR Part 210.21. Part 210.21 will refer you to 3015; however, you will use 3016 (for public sponsors) or 3019 (for private-not-for-profit sponsors).

These standards do not relieve the grantee of any contractual responsibilities under its contracts. Grantees shall use their own procurement procedures which reflect State and local laws as they conform to USDA regulations (ref. 3016 or 3019).

- *"Grantees shall maintain a written code or standards of conduct which shall govern the performance of their officers, employees, or agents engaged in the award and administration of contracts supported by federal funds."*

No one affiliated with the grantee (i.e. employee, officer, or agent) can take part in the selection or award of a contract supported by federal funds. **(A potential contractor cannot prepare and/or develop any procurement or contract documents. Part 3016.36(b)(3)(1-5) & 3019.42).**

- *"The grantee shall establish procurement procedures which provide that proposed procurement shall be reviewed by grantee officials to avoid the purchase of unnecessary or duplicate items". (3016.36(b)(4))*

Part 3016 stresses anticompetitive practices as implemented in Public Law 105-336. A potential contractor may provide specific information. However, a potential contractor cannot prepare procurement or contract documents (specifications, invitation to bid, statement of work, RFP, etc.) (3016.60(b)).

The grantee shall in its evaluation consider alternatives to ensure an economical purchase is made. Alternatives are, but not limited to; 1) breakout of different items so as not to limit competition; 2) or consolidate to achieve a more equitable price and /or fee; 3) and consider lease instead of purchase.

- *"All procurement transactions regardless of whether by sealed bids or by negotiations, and without regard to dollar value, shall be conducted in a manner that provides maximum open and fair competition consistent with regulations. Procurement procedures shall not restrict or eliminate competition."*

Awarding of a contract should only go to the contractor who can successfully carryout the terms and conditions of the proposal. Consideration should be given to integrity, past performance, and financial stability.

a) **Small purchases** - Simple and informal for procurement of services, and supplies whose cost in aggregate is less than \$100,000. If this procedure is used: "Price or rate quotations shall be obtained from an adequate number of qualified sources." Grantee shall comply with State and local small purchase limits under \$100,000.

b) **Competitive sealed bids** - Procurement of service, and/or supplies whose cost in aggregate is more than \$100,000, where formal advertising is used to solicit potential vendors: "Sealed bids are publicly solicited and a firm fixed price contract is awarded to the responsible bidder whose bid, conforming with all the material items and conditions of the invitation for bid, is the lowest in price." Under formal advertising the following requirements are a must.

- 1) A complete specification or purchase description is available from the grantor.
- 2) Bid proposals shall be solicited from an adequate number of suppliers willing and able to compete. This is done by making sure you advertise in as many media outlets available.
- 3) A sufficient time frame shall be established between the first day of advertising and the date bids are actually opened (at least 14 days, 21 days when soliciting Food Service Management Companies).
- 4) Bid proposals shall be opened publicly at a pre-designated place and time.
- 5) The award of the firm fixed price contract shall be made known to the successful bidder by written notice (3016.36(d)(2), 3019.44).

NOTE: Any information requested under "Evaluation Criteria" will be used only to establish that a bidder is responsive and responsible. (Example: financial statements, nutritional data-for end products, etc.)

c) **Noncompetitive negotiation** - Procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined to be inadequate. This type of procurement should be a last resort when all other methods are not feasible. Conditions for which other methods are infeasible are limited to the following:

- 1) The item or service is available from only one source.
- 2) An emergency situation exists that will not permit competitive solicitation.
- 3) Authorization from the state grantor agency. (3016.36(d)(4))

USDA Regulations and Other Resources:

7 CFR 210: (210.16 and 210.21)

http://www.fns.usda.gov/cnd/Governance/regulations/7cfr210_09.pdf

7 CFR 250: (250.12 and 250.30) http://www.fns.usda.gov/fdd/regs/fd_regulations.htm

7 CFR 3016 (Public Schools): http://www.access.gpo.gov/nara/cfr/waisidx_07/7cfr3016_07.html

7 CFR 3019 (Non-Public Schools):

http://www.access.gpo.gov/nara/cfr/waisidx_07/7cfr3019_07.html

USDA - Commodity Processing: <http://www.fns.usda.gov/fdd/processing/> and

<http://www.commodityfoods.usda.gov/processing.htm>

IDOE/SCNP: <http://www.doe.in.gov/food/procurement.html>

ACDA: <http://www.commodityfoods.org/>

National Food Service Management Institute: First Choice – A Purchasing Systems Manual for School Food Service 2nd Edition: (This document may be downloaded by chapter from the National Food Service Management Institutes web site.)

<http://nfsmi-web01.nfsmi.olemiss.edu/DocumentSearch.aspx> You will need to type “First Choice” in the “Title” box and then search.

FINANCIAL MANAGEMENT

Recordkeeping

There are financial recordkeeping requirements for the NSLP and SBP. We are only interested in the institution's resources and expenses as they relate to food service. It is required that RCCIs complete a food service Annual Financial Report in our online CNPweb system. This form is available at end of claims list each year and must be completed by October. Instructions for its completion are in Resources on the CNPweb.

Records should demonstrate compliance with program requirements and should include revenue and expenditure records sufficient to establish the nonprofit status of the food service operations. All records, including supporting documents such as bills and invoices, must be retained for a minimum of three years after the end of each school year.

RCCIs may use a bookkeeping system of their choice. The following section specifies the types of financial records that must be retained. Not every RCCI will have all types of assets and expenses.

Cash and Cash-like Records

Savings and/or Checking Account

Cash-on-hand

Cash due the program

Negotiable securities

Cash payable (a debit item)

Examples of Minimum Records

Bank Statements

Cash count record and petty cash account

Federal reimbursement due, charged lunches, discounts earned

Market value of T-bills, bonds and stocks owned by the nonprofit food service

A bill that is on hand to cover a legitimate nonprofit food service expense

Expenses

Net Purchases*

Commodity charges

Labor

Other Expenses

Examples of Minimum Records

Food purchases, less discounts and returns

State processing, handling and delivery charges

Payroll records, including employee/employer contributions to FICA, etc.

The nonprofit food service may pay these costs. Supporting bills must be retained. Examples are trash, utilities, insurance, paper, cleaning supplies, repairs, equipment, and depreciation**.

- * **Food Costs:** At the end of any program year, the nonprofit food service will need to know an average food cost per meal in order to allocate expenses on the AFR appropriately. The AFR instructions in the CNPweb system give complete guidance on this process. For a quicker idea of your meal cost, there is a sample on how to cost a meal in Appendix M.
- ** **Depreciation of Equipment:** This is defined as depreciation of nonexpendable food service equipment costing more than \$300 and having a useful life of more than one year. If equipment is depreciated, it should be depreciated over a twelve year period. Equipment costing under \$300 per unit may be expensed when purchased.

The following **non-financial** records must also be kept:

1. **Meal Counts** - RCCIs must keep a record of each site's daily meal count by meal and by category to support its Claim for Reimbursement.
2. **Free and Reduced Price Meal Data** - RCCIs must maintain an accurate record of the number of children eligible for free and reduced price meals (applications of day students), including any source documentation. This can be accomplished by maintaining your eligibility roster and any free and reduced price application files. Active applications should be divided into free and reduced categories, and should indicate the dates of any eligibility changes for children who have withdrawn from the site, or had a change in income or family size.
3. **Production Records and Menus** - Menus and production records must be maintained to demonstrate that the required number of food components and food items are offered on any given day. Production records should include sufficient information to evaluate the menu's contribution to the meal pattern.

Specific Prohibitions

1. Meals for both program and non-program adults may **not** be claimed for reimbursement. However, food service revenues may be used to pay for or subsidize meals for program adults. Non-program adults, however, are not to be supported by food service revenue. If you wish to charge non-program adults less than it costs to produce the meal, revenue must be transferred to the food service account from another source.

Note: A program adult is an individual whose job description includes some on-site responsibility for food service, i.e. SBP and NSLP. A non-program adult is an individual whose responsibilities do not include food service programs.

2. Revenues may not be used to purchase land or buildings or to construct buildings.
3. The RCCI must limit its net cash resources to an amount that does not exceed three months' average expenditures for its nonprofit food service or such other amount as may be approved by the SA in accordance with 7 CFR Part 210.19(a).

REIMBURSEMENT

Reimbursement rates are adjusted annually in mid July and vary for each program (NSLP & SBP). For the NSLP and SBP, there are three reimbursement rates: free, reduced priced and paid. The rates are posted on the School Nutrition page of our regular web-site:

www.doe.in.gov/food.

Non-pricing programs are those programs which do not charge children for meals. If your RCCI operates a pricing program, where children eligible for the reduced price and paid meal rate are required to pay for their meals, you should contact the SA for further instruction.

RCCIs are eligible for an additional 2 cents per lunch reimbursement if 60% or more of lunches in the second preceding year were served to children eligible for free and/or reduced price meals. This will be noted in the Sponsor Information Sheet in the year the RCCI becomes eligible.

The Severe Need Breakfast rates allow qualified sites to receive additional per breakfast reimbursement. Sites are designated in the Site Sheet Breakfast Program section as "severe need" if 40% or more of its lunches from the second preceding school year were served to children eligible for free or reduced price meals. This must be met on a site-by-site basis and is automatically figured from the online claims. If the same sponsor is operating more than one RCCI, eligibility is determined for each RCCI site separately.

Common questions about reimbursement

- Q.** How does an RCCI qualify for Severe Need Rates when it was not participating in the NSLP two years ago?
- A.** RCCIs which were not in the NSLP during the second preceding school year would not be eligible for Severe Need Rates. After the RCCI has participated in the NSLP for the two year period and has necessary participation data, it would then be eligible to qualify for the higher reimbursement rate. This will be automatically determined in the CNPweb™ system each year.

MEAL COUNTING AND CLAIMING SYSTEMS

In order to obtain federal reimbursement for meals served, trained adults must accurately count, record and claim the number of meals actually served to eligible participants.

RCCIs must have a Policy Statement approved by the SA before any meal count system is implemented. (Please refer to the Policy Statement section for specific requirements.) Also, all food service personnel must be adequately trained before starting a meals program.

The essential components of a good counting and claiming system are the point of service meal count and the recording and reporting procedures.

Any system in place must provide a "point of service" meal count:

- Of reimbursable meals served
- By type (free, reduced price and paid)
- Each day
- Without overtly identifying students receiving meal benefits

There are different ways to count meals served by category, but the most common tool used in RCCIs with day student is the check-off list.

Check-Off List

Check-off lists indicate the names of all eligible students, by category, and are used at the point of service to record the number of reimbursable meals served. Please see sample check-off list in Appendix K. As each child is served a meal, his/her name is checked off on the list. At the end of the service, check marks are added up, by category, to determine the daily meal count.

Check-off lists must be kept up-to-date and must accurately reflect the correct eligibility category of students. The names of children who have withdrawn from the institution should be marked off, and the date of withdrawal should be noted. Newly enrolled students must be added and the date noted.

For RCCIs whose students are all institutionalized, point-of-service may be done as simply as an "X" or a hash mark on a sheet of paper for each child being served a first meal. The paper must include the date and the type of meal being counted and maintained as documentation of numbers claimed for that meal on that date.

If residents are served family style, the information may be completed at the table. Any other variation to point-of-service counting should be approved by the State Agency.

Weekend Reimbursement

RCCIs can continue to receive reimbursement under the SBP and NSLP on the weekends. Reimbursement is made on a "per day of operation" basis. Therefore, reimbursement may be claimed for eligible meals served any day that an institution is approved to provide its services.

RCCI Sack Lunches Sent to Schools

In order for RCCIs to claim sack lunches sent to school with the institutionalized students, it must ensure that the school is not already claiming lunch for those children. RCCIs may claim such sack lunches if there is evidence that children would not otherwise be served a nutritious lunch or would not be served at an appropriate time. If appropriate, Offer versus Serve (OvS) should be exercised at the time the meal is packed at the RCCI, and should be packed, stored, and served under strict sanitary conditions to avoid contamination. OvS requirements are discussed in the Menu Planning section of this manual.

Non-Reimbursable Meals

The following items are **not** reimbursable and must not be included in the meal counts reported on the Claim for Reimbursement.

- Evening meals like supper
- Meal supplements such as snacks UNLESS on the After School Snack Program
- Adult meals
- Second meals eaten by eligible children
- A la carte items
- Meals given to day students to take home
- Meals not meeting the meal pattern requirements, e.g. sick tray with only soup
- Meals served to children of house parents

Internal Controls

An RCCI must establish internal controls to identify potential problems in the meal count system and to ensure that an accurate Claim for Reimbursement has been made. Internal controls protect RCCIs from having erroneous claims and potential over claims. Edits and monitoring are the two required internal controls.

Edit Checks - Daily meal counts should be entered on an edit-check sheet which is a mandatory record for schools and RCCIs. The daily meal count sheet is included in Appendix L. An edit check is a yellow light, a signal to proceed with caution in claiming free and reduced price meals. The attendance factor for RCCI is considered to be 100 percent, because students reside in the facility and would not be "absent."

Monitoring - Every school year, each RCCI with more than one site must perform at least one On-Site Review of each site under its jurisdiction. The on-site review must take place prior to February 1 of each school year. Furthermore, if the review discloses problems with a site's meal counting or claiming procedures, the RCCI must: 1) ensure that the site corrects the problem; and 2) within 45 days of the review, conduct a follow-up on-site review to determine that the problem has been corrected. Please contact the SA for monitoring procedures and review forms.

Written Instruction - It is highly recommended that each site within an RCCI maintain written instructions for all personnel which detail the operation of the meal count system and the responsibilities and duties of each person involved.

Reimbursement Claim

The Claim for Reimbursement and instructions are found in the online CNP web™ system. The information used to complete this form will be obtained from the school's point-of-service counting records, which have been consolidated on the daily meal count sheet. While only the Claim for Reimbursement is filed with the SA, it is required that all evidence be maintained on file to substantiate the data reported on the claim. This includes all participation records.

Submit the original Claim for Reimbursement as soon as possible after the month is over, but within 60 days after the end of the month for which the claim applies. It is important to remember that any claim submitted later than 60 days after the end of the claiming month will only be approved upon submitting a "one-time exception" explanation by letter or email. Sponsors get only one 'one-time exception' in a 3-year period.

Question about meal counting and claiming systems

Q: May RCCIs claim NSLP reimbursement for meals served at supper time or in the evening which meet the school lunch pattern, provided that reimbursement has not already been claimed for a prior lunch?

A: No. A lunch served under the NSLP is defined as a meal served to children around mid-day, specifically between the hours of ten and two o'clock. A meal served at a time which is traditionally considered the last meal of the day would not be in accordance with this requirement and would not be eligible for reimbursement.

State Agency Reviews

Coordinated Review Effort (CRE) and School Meals Initiative Review (SMI)

At a minimum, USDA requires a SA to conduct one on-site review of each RCCI at least once during each 5-year review cycle. It is the policy of our SA to review RCCIs at least once in a 2-3 year cycle. The RCCI could have the CRE review one year and 2-3 years later the SMI Review. If a follow-up review is required, the second review may incorporate any breakfast programs in operation. The CRE review may be conducted by either federal or state reviewers. Regardless of which agency conducts the review, the procedures and forms used will be the same.

How Does the SMI Review Compare to a CRE Review?

The Coordinated Review Effort, or CRE Review, focuses on the administrative aspects of the RCCI foodservice operations. The School Meals Initiative, or SMI Review, is a computerized nutritional analysis of one week's past menus.

The two critical areas of the CRE review are: (1) all free, reduced price and paid lunches claimed for reimbursement are served only to children eligible for those meals; and are counted, consolidated and reported through a system which consistently yields correct claims; and (2) lunches claimed for reimbursement contain food items/components as required by program regulations.

Five other program areas included in the review are: (1) the free and reduced price eligibility process, (2) food quantities, (3) civil rights, (4) RCCI monitoring responsibilities, and (5) reporting and recordkeeping.

CRE Reviews Have the Following Goals:

- To determine if free and reduced-price meal benefits are provided in accordance with the regulations
- To determine if proper meal counts are being taken at the point of service, and
- To determine if complete reimbursable meals are being offered.

SMI Reviews Have The Following Goals:

- To ensure Program meals meet the nutrition standards, and
- To ensure that RCCIs receive the technical assistance and resources needed to meet the nutrition standards.

Additional information on the CRE and SMI Reviews can be found on our website.

CALENDAR OF SCHOOL NUTRITION PROGRAM REQUIREMENTS

RCCIs

| <u>ITEM or PROCESS</u> | <u>DUE DATE</u> | <u>SUBMIT TO DOE</u> | <u>RETAIN IN FILE</u> |
|---|--------------------------------|----------------------|-----------------------|
| CNPweb Packet for new Program Year: Sponsor Information Sheet Site Information Sheet Other documents as starred on packet page | June 20 | ✓ on line | |
| Child Nutrition Program Agreement | June 20 | ✓ paper | |
| Food Service Management Co. Contract (if applicable) | June 20 | ✓ paper | |
| FDP re-certify for new program year Last date to re-certify | August 15 November 1 | ✓ on line | |
| Production Records | Daily | | ✓ |
| Claim for Reimbursement (CNPweb) Cannot be paid if submitted more than 60 calendar days following the end of claim month | 10 th of each month | ✓ on line | |
| Annual Financial Report (CNPweb) For previous program year | September 1 | ✓ on line | |
| Civil Rights Training | Annually | | ✓ |

Statement of Facts
(Eligibility documentation)
for

(name of institution)

Explain the **income policy** for the resident children of your institution. This constitutes documentation of their eligibility for free meals. Keep this document on file with your CNP contract.

For the institution:

(name & title)

(date)

For the State Agency:

(name & title)

(date)

Site _____ Month _____

Eligibility Roster (Sample)

[illegible]

Approval Official Signature _____ Date _____

Indiana Department of Education
Child Nutrition Programs' Instruction
January 10, 2008

DOE/NSLP
Policy 126

Incorporating the 2005 Dietary Guidelines for Americans into School Meals

PURPOSE: This memorandum provides guidance to incorporate the applicable recommendations of the 2005 Dietary Guidelines for Americans (DGAs) into the National School Lunch Program (NSLP) and the School Breakfast Program (SBP).

SCOPE: Organizations participating in the National School Lunch Program and the School Breakfast Program.

DESCRIPTION:

The Dietary Guidelines for Americans (DGAs) serve as the foundation for national nutrition policies, including the meal patterns and nutrient standards of the USDA Food and Nutrition Service (FNS) school meals programs. As you are aware, the Child Nutrition and WIC Reauthorization Act of 2004 (P.L. 108-265) amended section 9(a) of the Richard B. Russell National School Lunch Act to require that the Secretary issue guidance to increase the consumption of foods and food ingredients that are recommended for increased serving consumption in the most recent Dietary Guidelines for Americans. This memorandum provides guidance to incorporate the applicable recommendations of the 2005 DGAs into the National School Lunch Program (NSLP) and the School Breakfast Program (SBP).

Following the release of the 2005 DGAs, USDA assembled an internal working group of experienced nutritionists and program administrators to examine ways to implement the 2005 DGAs into the school meals programs, within group feeding limitations and cost restrictions, in preparation for beginning the rulemaking process. Given the complexity of issues uncovered during this process, USDA decided to contract with the Institute of Medicine (IOM) to convene a panel of experts from diverse specialties in child nutrition. This expert panel will provide USDA with recommendations to update the meal patterns and nutrition requirements for both the NSLP and the SBP. Once a cooperative agreement is signed, USDA estimates that it may take IOM from 18 to 24 months to provide the Department with these recommendations. USDA will then engage in the formal rulemaking process to promulgate a proposed rule that incorporates the IOM recommendations to the fullest extent practicable.

While awaiting a formal rulemaking, School Food Authorities (SFAs) should begin proactively implementing the applicable recommendations of the 2005 DGAs within the current meal pattern requirements and nutrition standards. Gradual implementation provides an opportunity for students to develop a taste for new items and/or modified recipes. The SA expects progressive implementation of the following recommendations by all SFAs, regardless of the menu planning approach being used.

FOOD GROUPS TO ENCOURAGE

WHOLE GRAINS

- SFAs should increase the amount and variety of whole grain products offered to students, and progress toward the goal of making half of all grains offered and served, whole grains.

The consumption of whole grains is strongly encouraged in the 2005 DGAs; one of the key recommendations states, “In general, at least half of the grains should come from whole grains.” The Food and Drug Administration, in draft industry guidance released after the publication of the 2005 DGAs, has defined whole grains as, “cereal grains that consist of the intact, ground, cracked or flaked caryopsis [kernel], whose principal anatomical components - the starchy endosperm, germ and bran - are present in the same relative proportions as they exist in the intact caryopsis.” According to the 2005 DGAs, the whole grain should be the first item listed in the ingredient statement in order for a product to be considered a whole grain; for many whole grain products, the words “whole” or “whole grain” appear before the grain ingredient’s name in the ingredient statement. Examples of common whole grains can be found in Table 7 of the 2005 DGAs document.

FRUITS AND VEGETABLES

- SFAs should increase the availability and service of both fruits and vegetables within the school meals programs.
- In the NSLP, SFAs should provide meals that offer both a fruit and a vegetable, regardless of the menu planning approach being used.

One of the key recommendations in the 2005 DGAs is to, “Choose a variety of fruits and vegetables each day. In particular, select from all five vegetable subgroups (dark green, orange, legumes, starchy vegetables, and other vegetables) several times a week.” Fruits and vegetables, as well as vegetable subgroups, offer somewhat different combinations of nutrients; thus, consuming a variety of each is important for a well-balanced diet.

MILK

- SFAs should offer only low-fat (1% or less) and fat-free milk in the school meal programs for all children above the age of two.

The 2005 DGAs include a recommendation to consume fat-free and low-fat milk and milk products on a daily basis, with a key recommendation stating, “Consume three cups per day of fat-free or low-fat milk or equivalent milk products. Children two to eight years should consume two cups per day of fat-free or low-fat milk or equivalent products.” The recommendation for low-fat and fat-free milk/milk products does not apply to children younger than two years of age. Statutory requirements necessitate offering fluid milk in a variety of fat contents in the NSLP; this requirement can be met by offering both low-fat and fat-free milk. Higher fat milks are unwarranted for children older than two.

NUTRIENTS WITHOUT CURRENT REGULATORY BENCHMARKS

SODIUM

- SFAs should begin reducing sodium incrementally, with a long-term, step-wise plan for meeting the DGAs recommendation.

For the first time, the 2005 DGAs have set a quantitative upper limit on daily sodium consumption. A key recommendation of the document is: “Consume less than 2,300 mg (approximately 1 tsp of salt) of sodium per day.” Previous versions have encouraged reduction of sodium intake, without providing a numeric target. Since past DGAs have not provided a quantitative sodium recommendation, neither have the school meals programs. However, SFAs have long been encouraged to reduce sodium in foods offered/served, and sodium levels have been monitored by FNS and SAs during School Meals Initiative reviews.

Current DGA recommendations are substantially lower than the average American’s daily intake. Since sodium is a common preservative, as well as a distinct flavor enhancer, successfully shifting the American palate toward no more than 2,300 mg per day will require a concerted effort across all food systems. SFAs should establish and commit to a plan that would reduce the sodium levels in school meals incrementally; a gradual, long term approach to meet the DGAs recommendations will allow students’ palates and the product marketplace the necessary time to adjust.

FIBER

- SFAs should plan meals that provide fiber at levels appropriate for each age/grade group that reflect the 2005 DGAs recommendation.

The 2005 DGAs are the first to quantify a daily fiber recommendation: “The recommended dietary fiber intake is 14 grams per 1,000 calories consumed.” Previous versions of the DGAs simply encouraged increased fiber intake, without specifying a numeric target. Hence, the nutrient standards of school meals followed suit by encouraging consumption without requiring a minimum level.

Now that a specific intake target has been published in the DGAs, SFAs should move toward this target. Even SFAs that have been meeting recommended benchmarks for fiber over the past few years will likely need to increase fiber to meet the DGA level. For example, school meals planned to meet the nutrition requirements for the Grade IV age/grade group in the Traditional Food Based Menu Planning Approach should offer meals that, on average over a school week, provide at least 11 grams of fiber based on the minimum caloric requirement of 785 calories.

Fiber is found naturally in fruits, vegetables (particularly legumes) and whole grains; these food groups can be significantly, but gradually, increased in school meals. Gradual increases now, will allow students’ palates to adjust and will make the transition to a numeric fiber target easier. Fruits can be served without the addition of salt, butter or sauces; the addition of whole fruits as a choice in school menus will increase fiber while reducing sodium.

CHOLESTEROL

- SFAs should plan meals that, on average over a school week, provide less than 100 mg of cholesterol at lunch and less than 75 mg of cholesterol at breakfast for all age/grade groups.

The current nutrition requirements for both lunch and breakfast encourage schools to reduce cholesterol levels. A maximum threshold has not been established because the previous version of the DGAs encouraged low cholesterol intake, but did not specify a numeric target. A key recommendation of the 2005 DGAs, however, is to consume “less than 300 mg/day of cholesterol.” Therefore, SFAs should encourage SFAs to plan menus that, on average over a school week, do not exceed more than one-fourth of the daily recommendation at breakfast and no more than one-third of the daily recommendation at lunch. Data from the third School Nutrition Dietary Assessment study (SNDA-III) indicate that many SFAs are already offering meals at or below levels that reflect the 2005 DGAs recommendation (i.e., 100 mg for lunches and 75 mg for breakfast).

TRANS FATS

- SFAs should plan meals that minimize trans fats.

The 2005s DGAs represent the first discussion of trans fats in national nutrition policy. A key recommendation of the document includes, “keep trans fatty acid consumption as low as possible.” While a numeric target is not included, SFAs should be cognizant of trans fats in all foods that are offered/served and to work toward minimizing these unhealthy fats.

SUMMARY

While awaiting publication of the final rule updating the school meal patterns and nutrition standards, SFAs should begin to proactively implement the 2005 DGAs. Implementation can be accomplished through a variety of initiatives such as:

- increasing whole grains
- increasing both fruits and vegetables
- offering only low-fat and fat-free milk/milk products
- reducing sodium
- increasing fiber
- controlling cholesterol
- minimizing trans fats

FNS is in the process of developing technical assistance tools that will further assist schools in meeting the 2005 DGAs; these tools will be distributed as they are finalized.

Thank you for your dedication and cooperation in ensuring that Child Nutrition Programs deliver the best possible nutrition service to the Nation’s children.



MENU PLANNING IN THE NATIONAL SCHOOL LUNCH PROGRAM

The National School Lunch Act mandates that school meals "safeguard the health and well-being of the Nation's children". Participating schools must serve lunches that are consistent with the applicable recommendations of the most recent Dietary Guidelines for Americans including: eat a variety of foods; choose a diet with plenty of grain products, vegetables and fruits; choose a diet moderate in sugars and salt; and choose a diet with 30% or less of calories from fat and less than 10% of calories from saturated fat. In addition, lunches must provide, on average over each school week, at least 1/3 of the daily Recommended Dietary Allowances for protein, iron, calcium, and vitamins A and C. To provide local food service professionals with flexibility, there are four menu planning approaches to plan healthful and appealing meals. Schools choose one of the approaches below. Local schools make the choice of what specific foods are served and how they are prepared and presented.

(See charts on following pages.)

The Traditional Food-Based Menu Planning Approach

Under the Traditional Food-Based Menu Planning Approach, schools must comply with specific component and quantity requirements by offering five food items from four food components. These components are: meat/meat alternate, vegetables and/or fruits, grains/breads, and milk. Minimum portion sizes are established by ages and grade groups.

| TRADITIONAL FOOD-BASED MENU PLANNING APPROACH—MEAL PATTERN FOR LUNCHESES | | | | | |
|---|--|--|--|--|---|
| MINIMUM QUANTITIES | | | | | RECOMMENDED QUANTITIES |
| FOOD COMPONENTS AND FOOD ITEMS | GROUP I AGES 1-2 PRESCHOOL | GROUP II AGES 3-4 PRESCHOOL | GROUP III, AGES 5-8 GRADES K-3 | GROUP IV AGES 9 and older GRADES 4-12 | GROUP V AGES 12 and older GRADES 7-12 |
| Milk (as a beverage) | 6 fluid ounces | 6 fluid ounces | 8 fluid ounces | 8 fluid ounces | 8 fluid ounces |
| Meat or Meat Alternate (quantity of the edible portion as served): | | | | | |
| Lean meat, poultry, or fish | 1 ounce | 1½ ounces | 1½ ounces | 2 ounces | 3 ounces |
| Alternate Protein Products ¹ | 1 ounce | 1½ ounces | 1½ ounces | 2 ounces | 3 ounces |
| Cheese | 1 ounce | 1½ ounces | 1½ ounces | 2 ounces | 3 ounces |
| Large egg | ½ | ¾ | ¾ | 1 | 1½ |
| Cooked dry beans or peas | ¼ cup | 3/8 cup | 3/8 cup | ½ cup | ¾ cup |
| Peanut butter or other nut or seed butters | 2 tablespoons | 3 tablespoons | 3 tablespoons | 4 tablespoons | 6 tablespoons |
| Yogurt, plain or flavored, unsweetened or sweetened | 4 ounces or ½ cup | 6 ounces or ¾ cup | 6 ounces or ¾ cup | 8 ounces or 1 cup | 12 ounces or 1½ cups |
| The following may be used to meet no more than 50% of the requirement and must be used in combination with any of the above: Peanuts, soynuts, tree nuts, or seeds, as listed in program guidance, or an equivalent quantity of any combination of the above meat/meat alternate (1 ounce of nuts/seeds=1 ounce of cooked lean meat, poultry, or fish) | ½ ounce =50% | ¾ ounce =50% | ¾ ounce =50% | 1 ounce =50% | 1½ ounces =50% |
| Vegetable or Fruit: 2 or more servings of vegetables, fruits or both | ½ cup | ½ cup | ½ cup | ¾ cup | ¾ cup |
| Grains/Breads: (servings per week): Must be enriched or whole grain. A serving is a slice of bread or an equivalent serving of biscuits, rolls, etc., or ½ cup of cooked rice, macaroni, noodles, other pasta products or cereal grains. | 5 servings per week ² -- minimum of ½ serving per day | 8 servings per week ² -- minimum of 1 serving per day | 8 servings per week ² -- minimum of 1 serving per day | 8 servings per week ² -- minimum of 1 serving per day | 10 servings per week ² -- minimum of 1 serving per day |

¹ Must meet the requirements in Appendix A of 7 CFR 210.

² For the purposes of this table, a week equals five days.

The Traditional Food-Based Menu Planning Approach is designed to meet nutritional standards set forth in program regulations.

The Enhanced Food-Based Menu Planning Approach

The Enhanced Food-Based Menu Planning Approach is a variation of the Traditional Menu Planning Approach. It is designed to increase calories from low-fat food sources in order to meet the Dietary Guidelines. The five food components are retained, but the component quantities for the weekly servings of vegetables and fruits and grains/breads are increased.

| ENHANCED FOOD-BASED MENU PLANNING APPROACH-MEAL PATTERN FOR LUNCHES | | | | | |
|---|---|---|---|---|---|
| MINIMUM REQUIREMENTS | | | | | OPTION FOR |
| FOOD COMPONENTS AND FOOD ITEMS | AGES 1-2 | PRESCHOOL | GRADES K-6 | GRADES 7-12 | GRADES K-3 |
| Milk (as a beverage) | 6 fluid ounces | 6 fluid ounces | 8 fluid ounces | 8 fluid ounces | 8 fluid ounces |
| Meat or Meat Alternate (quantity of the edible portion as served): | | | | | |
| Lean meat, poultry, or fish | 1 ounce | 1½ ounces | 2 ounces | 2 ounces | 1½ ounces |
| Alternate protein products ¹ | 1 ounce | 1½ ounces | 2 ounces | 2 ounces | 1½ ounces |
| Cheese | 1 ounce | 1½ ounces | 2 ounces | 2 ounces | 1½ ounces |
| Large egg | ½ | ¾ | 1 | 1 | ¾ |
| Cooked dry beans or peas | ¼ cup | 3/8 cup | ½ cup | ½ cup | 3/8 cup |
| Peanut butter or other nut or seed butters | 2 tablespoons | 3 tablespoons | 4 tablespoons | 4 tablespoons | 3 tablespoons |
| Yogurt, plain or flavored, unsweetened or sweetened | 4 ounces or ½ cup | 6 ounces or ¾ cup | 8 ounces or 1 cup | 8 ounces or 1 cup | 6 ounces or ¾ cup |
| The following may be used to meet no more than 50% of the requirement and must be used in combination with any of the above: Peanuts, soy nuts, tree nuts, or seeds, as listed in program guidance, or an equivalent quantity of any combination of the above meat/meat alternate (1 ounce of nuts/seeds equals 1 ounce of cooked lean meat, poultry or fish). | ½ ounce =50% | ¾ ounce =50% | 1 ounce =50% | 1 ounce =50% | ¾ ounce =50% |
| Vegetable or Fruit: 2 or more servings of vegetables, fruits or both | ½ cup | ½ cup | ¾ cup plus an extra ½ cup over a week ² | 1 cup | ¾ cup |
| Grains/Breads (servings per week): Must be enriched or whole grain. A serving is a slice of bread or an equivalent serving of biscuits, rolls, etc., or ½ cup of cooked rice, macaroni, noodles, other pasta products or cereal grains. | 5 servings per week ² – minimum of ½ serving per day | 8 servings per week ² – minimum of 1 serving per day | 12 servings per week ² – minimum of 1 serving per day ³ | 15 servings per week ² – minimum of 1 serving per day ³ | 10 servings per week ² – minimum of 1 serving per day ³ |

¹ Must meet the requirements in Appendix A of 7 CFR 210.

² For the purposes of this table, a week equals five days

³ Up to one grains/breads serving per day may be a dessert.

The Enhanced Food Based Menu Planning Approach is designed to meet the nutritional standards set forth in program regulations.

The Nutrient Standard Menu Planning Approach

Nutrient Standard Menu Planning (sometimes called “NuMenus”) is a computer-based menu planning system that uses approved computer software to analyze the specific nutrient content of menu items automatically while menus are being planned. It is designed to assist menu planners in choosing food items that create nutritious meals and meet the nutrient standards.

The Assisted Nutrient Standard Menu Planning Approach

Assisted Nutrient Standard Menu Planning (sometimes called “Assisted NuMenus”) is a variation of Nutrient Standard Menu Planning. It is for schools that lack the technical resources to conduct nutrient analysis themselves. Instead, schools have an outside source, such as another school district, State agency or a consultant, plan and analyze a menu based on local needs and preferences. The outside source also provides schools with recipes and product specifications to support the menus. The menus and analyses are periodically updated to reflect any changes in the menu or student selection patterns.

Here are the required minimums for nutrients and calories for these nutrient standard menu planning approaches:

| MINIMUM NUTRIENT AND CALORIE LEVELS FOR SCHOOL LUNCHES NUTRIENT STANDARD MENU PLANNING APPROACHES (SCHOOL WEEK AVERAGES) | | | | |
|---|----------------------|-----------------|--------------|-----------------|
| | MINIMUM REQUIREMENTS | | | OPTIONAL |
| NUTRIENTS AND ENERGY ALLOWANCES | Preschool | Grades K-6 | Grades 7-12 | Grades K-3 |
| Energy allowances (calories) | 517 | 664 | 825 | 633 |
| Total fat (as a percentage of actual total food energy) | ¹ | ^{1, 2} | ² | ^{1, 2} |
| Saturated fat (as a percentage of actual total food energy) | ¹ | ^{1, 3} | ³ | ^{1, 3} |
| RDA for protein (g) | 7 | 10 | 16 | 9 |
| RDA for calcium (mg) | 267 | 286 | 400 | 267 |
| RDA for iron (mg) | 3.3 | 3.5 | 4.5 | 3.3 |
| RDA for Vitamin A (RE) | 150 | 224 | 300 | 200 |
| RDA for Vitamin C (mg) | 14 | 15 | 18 | 15 |

¹ The Dietary Guidelines recommend that after 2 years of age “...children should gradually adopt a diet that, by about 5 years of age, contains no more than 30 percent of calories from fat.”

² Not to exceed 30 percent over a school week

³ Less than 10 percent over a school week

Alternate Menu Planning Approach

This menu planning approach allows states and school districts to develop their own innovative approaches to menu planning, subject to the guidelines established in our regulations. These guidelines protect the nutritional and fiscal integrity of the program.

September 1, 2000

See the Menu Planner for more details on menu planning.

Chart 2A

SCHOOL BREAKFAST PATTERNS

TRADITIONAL FOOD-BASED MENU PLANNING ALTERNATIVE — Meal Pattern

| FOOD COMPONENTS AND FOOD ITEMS | MINIMUM REQUIREMENTS | | |
|--|----------------------|---------------------|-----------------|
| | AGES 1 and 2 | PRESCHOOL | GRADES K-12 |
| Milk (Fluid) (As a beverage, on cereal, or both) | 4 fl oz (1/2 cup) | 6 fl oz (3/4 cup) | 8 fl oz (1 cup) |
| Juice/Fruit/Vegetable Fruit and/or vegetable; or full-strength fruit juice or vegetable juice | 1/4 cup | 1/2 cup | 1/2 cup |
| SELECT ONE SERVING FROM EACH OF THE FOLLOWING COMPONENTS; TWO FROM ONE COMPONENT; OR AN EQUIVALENT COMBINATION¹: | | | |
| Grains/Breads² | | | |
| Whole-grain or enriched bread | 1/2 slice | 1/2 slice | 1 slice |
| Whole-grain or enriched biscuit, roll, muffin, etc. | 1/2 serving | 1/2 serving | 1 serving |
| Whole-grain, enriched, or fortified cereal | 1/4 cup or 1/3 oz | 1/3 cup or 1/2 oz | 3/4 cup or 1 oz |
| Meat or Meat Alternate^{3, 4, 5} | | | |
| Lean meat/poultry or fish | 1/2 oz | 1/2 oz | 1 oz |
| Alternate protein products ³ | 1/2 oz | 1/2 oz | 1 oz |
| Cheese | 1/2 oz | 1/2 oz | 1 oz |
| Egg (large) | 1/2 large egg | 1/2 large egg | 1/2 large egg |
| Peanut butter or other nut or seed butters | 1 Tbsp | 1 Tbsp | 2 Tbsp |
| Cooked dry beans and peas | 2 Tbsp | 2 Tbsp | 4 Tbsp |
| Nuts and/or seeds (as listed in program guidance) ^{4, 5} | 1/2 oz ⁵ | 1/2 oz ⁵ | 1 oz |
| Yogurt, plain or flavored, unsweetened, or sweetened – commercially prepared | 2 oz or 1/4 cup | 2 oz or 1/4 cup | 4 oz or 1/2 cup |

¹ Minimum servings for meat/meat alternate = 0.25 ounce and for grains/breads = 1/4 serving.

² Grains/Breads must be enriched or whole-grain or made from enriched or whole-grain flour or meal that may include bran and/or germ.

³ Alternate protein products must meet requirements in Appendix A 7 CFR Part 220.

⁴ No more than 1 ounce of nuts and/or seeds may be served in any one breakfast.

⁵ Nuts and seeds are generally not recommended to be served to children ages 1-3 since they present a choking hazard. If served, nuts and seeds should be finely minced.

**Chart 3 NATIONAL SCHOOL LUNCH PROGRAM MEAL PATTERN
AFTERSCHOOL SNACKS**

SELECT TWO OF THE FOUR COMPONENTS FOR A REIMBURSABLE SNACK

| FOOD COMPONENTS AND FOOD ITEMS ¹ | CHILDREN AGES 1 and 2 | CHILDREN AGES 3-5 | CHILDREN AGES 6-12 ¹ |
|---|--------------------------------|--------------------------------|------------------------------------|
| Milk | | | |
| Fluid milk | 4 fl oz (1/2 cup) | 4 fl oz (1/2 cup) | 8 fl oz (1 cup) |
| Vegetable or Fruit^{2, 3} | | | |
| Juice ^{2, 3} , fruit, and/or vegetable | 1/2 cup | 1/2 cup | 3/4 cup |
| Grains/Breads^{4, 4} | | | |
| Bread or | 1/2 slice | 1/2 slice | 1 slice |
| Combread or biscuit or roll or muffin or | 1/2 serving | 1/2 serving | 1 serving |
| Cold dry cereal ⁴ or | 1/4 cup or 1/3 oz ⁴ | 1/3 cup or 1/2 oz ⁴ | 3/4 cup or 1 oz ⁴ |
| Cooked cereal grains or | 1/4 cup | 1/4 cup | 1/2 cup |
| Cooked pasta or noodles | 1/4 cup | 1/4 cup | 1/2 cup |
| Meat/Meat Alternate^{5, 5, 7} | | | |
| Lean meat or poultry or fish ⁵ or | 1/2 oz | 1/2 oz | 1 oz |
| Alternate protein products ⁶ or | 1/2 oz | 1/2 oz | 1 oz |
| Cheese or | 1/2 oz | 1/2 oz | 1 oz |
| Egg (large) or | 1/2 large egg | 1/2 large egg | 1/2 large egg |
| Cooked dry beans or peas or | 1/8 cup | 1/8 cup | 1/4 cup |
| Peanut or other nut or seed butters or | 1 Tbsp | 1 Tbsp | 2 Tbsp |
| Nuts and/or seeds ⁷ or | 1/2 oz ⁷ | 1/2 oz ⁷ | 1 oz |
| Yogurt ⁸ | 2 oz or 1/4 cup | 2 oz or 1/4 cup | 4 oz or 1/2 cup |

¹ Children age 12 and older may be served larger portions based on their greater food needs. They may not be served less than the minimum quantities listed in this column.

² Full strength vegetable and/or fruit juice or an equivalent quantity of any combination of vegetable(s), fruit(s), and juice.

³ Grains/Breads must be whole-grain or enriched, or made from whole-grain or enriched flour or meal that may include bran and/or germ. Cereal must be whole-grain, enriched, or fortified.

⁴ Either volume (cup) or weight (oz), whichever is less.

⁵ A serving consists of the edible portion of cooked lean meat or poultry or fish.

⁶ Alternate protein products must meet requirements in Appendix A of 7 CFR Part 210.

⁷ Nuts and seeds are generally not recommended to be served to children ages 1-3 since they present a choking hazard. If served, nuts and seeds should be finely minced.

⁸ Yogurt may be plain or flavored, unsweetened, or sweetened – commercially prepared.

⁹ Juice may not be served when milk is the only other component.

The Basic Difference between Choices and Offer vs Serve (OvS)

Choices

Whenever possible all children should be given choices of different foods in each component food group. Offering choices gives students more of an opportunity to select foods they will eat, and recognizes the fact that not all students have the same tastes. It increases the chance that more children will choose to have a school lunch and that a student will select and eat a full meal. Our goal in the Child Nutrition Programs is to encourage the consumption of a wide variety of nutritious foods in well-balanced, healthful meals.

Example: white or chocolate milk, hot dog or hamburger

Offer versus Serve (OvS)

General Rules:

- Allows students to decline a certain number of food items in the meal
- Reduces food waste and food costs
- The meal must be priced as a unit and may be counted as reimbursable.
- Must be implemented in senior high schools for lunch
- Is optional at all lower grade levels
- Options: decline only one item, upper elem grades only

Example: milk or no milk

For food based menus, both Traditional and Enhanced:

NSLP --

All five food items must be offered to all students.
Serving sizes must equal minimum required quantities by age or grade group.
Secondary students have the option of which one or two food item(s) to decline. Other options for lower grades...

SBP --

All four food items must be offered to students.
Serving sizes must equal minimum quantities required by age or grade group.
Students have the option of which one item to decline.

For nutrient based menus, both NuMenus and Assisted NuMenus:

NSLP --

Minimum of three menu items offered to include an entree and a milk.
Student must select at least two items and one must be an entree.
If more than three items offered, student may decline no more than two.

SBP --

Minimum of three menu items must be offered.
Student must select at least two items.
May decline a maximum of one item.

References:

Pages 52, 80, 243 A Menu Planner for Healthy School Meals, 1998

Examples in NSLP:

| <u>Menu</u> | <u>5 Food Items</u> | <u>4 Components</u> |
|-----------------------|---------------------|------------------------------------|
| 1. Oven-baked chicken | 1. Chicken | 1. Meat/Meat alternate |
| 2. Green beans | 2. Beans | 2. Vegetable/fruit (2 servings) |
| 3. Canned peaches | 3. Peaches | 3. Grains/breads |
| 4. Hot roll | 4. Bread | 4. Fluid milk |
| 5. Milk | 5. Fluid milk | |

This sample menu, assuming appropriate serving sizes, is acceptable, as it offers the five required food items and the four required food components.

Identifying a reimbursable lunch under OvS:

| | | |
|-------|--|--|
| Menu: | Hamburger patty (2 oz) Bun (whole) Lettuce leaf and tomato slice (¼ c total) Small apple (½ cup) Milk (½ pint) | Meat/Meat alternate Grains/breads Vegetable/fruit Vegetable/fruit Fluid milk |
|-------|--|--|

If a child takes full portions of:

| | | |
|---------------------------------|---------------------------------|--|
| Hamburger patty Bun Apple | Hamburger patty Milk Milk | Hamburger patty Lettuce leaf Apple |
|---------------------------------|---------------------------------|--|

Is it a reimbursable meal?

| | | |
|--|--|--|
| Yes Three full portions were chosen. Even though the bun equals two servings of bread, it counts as only one food item for this meal. However, the two servings help meet the requirement that 8 servings of bread be offered per week. | No This lunch contains only 2 food items. A second portion of any item does not count towards a reimbursable lunch. | No The lettuce leaf and tomato slice constitute one vegetable item. The lettuce by itself is not a full food item. The child must add the tomato slice to fulfill one vegetable item or select a full portion of another food item. |
|--|--|--|

IDOE SCNP Food Based Production Record

(Make additional copies as needed)

Page _____ of _____

Site: _____

Date: _____

Offer vs. Serve

☐ Yes ☐ No

Menu Pattern (please check one and include grade groupings)

☐ Traditional ☐ Enhanced

Grade Groupings:

☐ K-3

☐ 4-12

☐ 7-12 optional

Grade Groupings:

☐ K-6

☐ 7-12

☐ K-3 optional

| Number of Meals Served |
|-------------------------|
| Student Meals: _____ |
| Adult Meals: _____ |
| A la Carte Meals: _____ |
| Total Meals: _____ |

| A Menu Item, Recipe # or Product Name | B Grade Group Served | C Portion Size & Amount | D Total # Portions Planned | E Portions/ Purchase Unit (use Food Buying Guide) | F Pack Medium | G Total # Portions Prepared | H # Portions Leftover | I Total Units Used |
|--|-------------------------|----------------------------|-------------------------------|--|------------------|--------------------------------|--------------------------|-----------------------|
| Meat/Meat Alternate | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| Vegetable/Fruit | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| Grains/Bread | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| Milk/Condiments/Desserts, etc. | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

Instructions for Completing the IDOE SCNP Food Based Production Record

| | | |
|---|-------------------------------------|---|
| A | Menu Item/ Recipe # or Product Name | Indicate the specific recipes and food products to be used to prepare the item. List all food items including condiments and milk. Be sure to include product name such as Red Baron Pizza or D-35 for USDA Recipes, or numbers given to your own recipe. |
| B | Grade Grouping | Identify the grade grouping being served. This information should follow the grade groupings of your selected menu planning option - Enhanced lunch would have K-6 and 7-12 groupings with an optional K-3 grouping - Traditional lunch would have K-3 and 4-12 groupings with an optional 7-12 grouping. |
| C | Portion Size and Amount | Indicate the actual portion size for each food listed in column A for each grade group listed in column B. This should be the actual portion size that must be served to meet the meal component requirements, e.g., a chicken patty may actually be 3.6 oz. but meet the 2 oz requirement for meat/meat alternate. |
| D | Total # Portions Planned | Record the number of portions planned for each menu item in each grouping. This should include portions prepared for adults and a la carte meals. |
| E | Portions/Purchase Unit | Use the Food Buying Guide to determine the number of portions you get per purchase unit (box, bag, lb., case, etc). This should correspond to the portion size listed in Column C (e.g., green beans, 24-1/2C servings/10 can or Tater Tots, 30-1/2 C/5# bag). |
| F | Pack Medium | Indicate the package medium if appropriate, e.g., light syrup, heavy syrup, own juices, oil, water, dry, etc. |
| G | Total # Portions Prepared | List the total number of portions prepared for each food item based on the portion size in Column C. This should include portions prepared for staff, adults and a la carte meals. |
| H | Total Portions Leftover | Count the number of leftover portions for each food item and based on the portion size in Column C, e.g., 3 burgers, 6 milks, 10 oranges, 4 servings of rice). If any amount remains in pans, convert to number of servings. |
| I | Total Units Used | The number of units (box, bag, lb., case) used to make the amount in Column E, e.g., 2 cases, 10 lbs., 6-#10 cans. |

MENU PLANNING TIPS

Student Acceptance - Planning menus requires special care. Food service personnel must not only plan meals that meet meal requirements, but they must also strive to provide meals with food items that are acceptable to children. Only then will they consume the whole meal, and only then will they receive the full nutritional value of the meal offered to them.

To achieve this goal, food service personnel must know the preferences of their customers. Two ways to learn children's choices are to have tasting panels for children and to have children help plan menus. Another way to evaluate acceptance of each menu item is to review past food production records and food waste each time specific items are served. If you observe over time that an item is unpopular, try revising the recipe or using a different brand of a processed product before substituting more popular but less nutritious foods.

Food service personnel can rely on their experience and knowledge in order to maximize both acceptability and nutrition in the meals they provide.

Offering Choices - Try to offer as many choices as possible of different foods within each food component group. Offering choices give children more of an opportunity to select foods they will eat and recognizes the fact that not all children have the same tastes. It also increases the chances that children will select a full meal. For instance, if three or four fruits and vegetables were offered, it is more likely that children will select and eat at least two. One of the goals of the NSLP and the SBP is to encourage the consumption of a wide variety of nutritious foods in well-balanced, healthy meals. Offering carefully planned choices can result in increased customer satisfaction, improved nutritional awareness and less food waste.

Practical Ideas - The following suggestions are tips to make your lunches and breakfasts complete and more attractive to children. The success of your lunch and breakfast programs depends on how appealing children find the meals. The attractiveness of meals is particularly important in areas where OvS has been implemented, in order to ensure that children will take meals that meet minimum requirements for reimbursement.

Regulations allow the meat/meat alternate to be served in the main dish **or** in the main dish and in one other menu item. However, it is easier to determine that a complete component has been taken if the main dish contains the full serving of a meat/meat alternate. If a menu is occasionally planned in which the meat/meat alternate is split between menu items (e.g., a soup and sandwich combination), serve the two items together.

In RCCIs that **do not** offer choices of meat/meat alternates each day, it is recommended that no one form of meat (e.g., ground, sliced) be served more than three times a week. For example, four items made with ground beef, such as tacos, spaghetti with meat sauce, hamburgers and meatloaf should not be served in a single week. Likewise, no one form of meat alternate foods (cheese, cooked dry beans or peas, eggs, peanut butter or other nut/seed butters, peanuts, soy

nuts, tree nuts, and seeds) should be served more than three times a week. Four cheese items such as grilled cheese sandwich, macaroni and cheese, cheese pizza and cheese lasagna should not be served in a single week. Greater variety can increase the appeal, and therefore consumption, of meals.

RCCIs that **do** offer choices of meat/meat alternates each day may serve any one meat alternate or form of meat as frequently as good menu planning practices allow. Remember to consider meats such as ground turkey in order to add variety to and lower the fat content of the meals served.

Plan only full servings of grains/breads. If there are two menu items containing this component, be sure each of these items contains a full serving. For example, if chicken with rice and a dinner roll is served, each should provide a full serving. Either the rice or the roll can then be counted as a grains/breads item. Otherwise, if the rice does not contain a full serving and the child opts for the rice, but not the dinner roll, the meal may be incomplete.

Planning is also important to ensure that children will take enough vegetables/fruit to meet the minimum serving requirement. Children must receive two or more servings of different items to total the minimum requirement. If you offer vegetable/fruit in equal serving sizes, and at least two different choices of items, children will be more likely to select two items and meet the requirement.

Remember that a serving of mixed vegetables/fruit (e.g., peaches and pears or peas and carrots) counts only as one food item. Also, you must not count a second serving of the **same** vegetable/fruit as a food item, due to the requirement that the two vegetable/fruit servings must be from different sources.

Studies indicate children consume more fruit, raw vegetables and potato dishes than other cooked vegetables (for example, children take more orange wedges than cooked spinach). Plan larger portions of these foods and smaller portions of cooked vegetables. Use fresh, canned, frozen and dried fruits interchangeably.

You can look to different kinds of breads to enhance your breakfast program:

- Use a variety of hot breads (e.g., cornbread made with “whole corn” or “enriched corn”) and different kinds of muffins and biscuits.
- Try breakfast rolls made with bulgur, rolled wheat or oats.
- Include breakfast sandwiches, pancakes, waffles and French toast as additional menu options.
- Serve hot cereals or use dry cereals, including those made from enriched or whole-grain wheat, corn, rice, and oats. Try to avoid cereals with high sugar content.

Coordinating Breakfast and Lunch Menus

- Avoid repeating the same food items for different meals during the day. For example, try not to serve orange juice at breakfast and again at lunch. All meals served should consist of complementary food items, so that the end result will be well-balanced meals for the day.
- Be sure the equipment you use for the preparation of breakfast will not interfere with what you need to prepare for lunch.
- Schedule personnel carefully so they can be effective and efficient.

51

INSTRUCTIONS FOR CHECK-OFF LIST

This form is designed to be used at the point of service to mark as children receive reimbursable meals. It is marked as children pass the point of service and identify themselves by name.

- 1) Month & Year: Enter the current month and year.
- 2) Site: Enter the name of the site or RCCI.
- 3) Child Name: List all students in the class alphabetically. (Do not group students by meal type or code.)
- 4) Code: Mark your code indicating whether the child is eligible to receive his lunch free, reduced-price, or paid. (Children should not be able to identify each other's eligibility.)
- 5) MTUWTHFSASU: Fill in appropriate dates. The first date recorded should be entered in the block that represents that day of the week. For example, if November 1 falls on a Thursday enter 1 in the fourth block of the first group. Continue entering each day of the meal service for the month.
- 6) Books: As the child receives a reimbursable meal, put a hash mark in the appropriate box for the day.
- 7) Total Free: Total the free hash marks for that day and enter the total number of reimbursable free meals served.
- 8) Total Reduced-Price: Total the reduced-price hash marks for that day and enter the total number of reimbursable reduced-price meals served.
- 9) Total Paid: Total the paid hash marks for that day and enter the total number of reimbursable paid meals served.
- 10) Total Meals: Sum the totals of free, reduced-price, paid and enter the total number of meals served.

Edit Check of Daily Meal Counts

Site Name: _____ Month/Year _____ Enrollment _____

Circle one: **Breakfast** **Lunch** Site Attendance Factor _____ % Number of Days Meals were served _____

Multiply State or Local Attendance Factor by the number eligible in each category to obtain the number of meals potentially eligible:

| | Paid | Free | Reduced | |
|--|------|------|---------|--|
| | | | | |

| Eligible | | | | Served | | | | |
|----------|------------------|---------------------|-----------------|--------|------|---------|-----------------------|---------------------------------------|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| Paid | Eligible Free | Eligible Reduced | Day of Month | Paid | Free | Reduced | Totals Col 5, 6, 7 | Justification for Overclaim Variances |
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Signature _____ Title _____

Edit Check Instructions

This is used to record the daily meal counts for each meal for each site for reporting each month. We emphasize the importance of keeping this form. This document should be used to “edit check” the monthly site claim.

Entries must be posted daily. This form must be kept on file for a period of at least three years, not including the current year. Do not send this form to the state agency.

Edit checks will need to be completed and signed at the end of the month prior to submitting the monthly claim. The number of meals served should be compared to the maximum number eligible (attendance factor times the number eligible), as well as the number eligible in the corresponding category. Should the number served exceed any of the comparable totals, justification should be documented in column 9.

This is not a required form; however, the data listed is pertinent and is the required minimum and must be included on any form the RCCI chooses to use.

Enrollment: Enter the number of children who have access to meals. The school should use the highest number during the month.

Attendance Factor: Divide the average daily attendance (ADA) by the enrollment to obtain the local attendance factor or use the state factor, **whichever is greater**.

Number of days meals served: Enter the number of days in operation for the month.

Attendance Factor times the number Eligible: This figure represents the number of meals eligible by category on a daily basis for edit check purposes only. The school should use the largest number of eligibles recorded for the month in each category.

Signature and Title: The person responsible for completing the edit check should sign when the form is complete.

| | |
|----------|--|
| Column 1 | Enter the total number of paid children eligible to receive a meal. |
| Column 2 | Enter the number of approved FREE children’s applications on file |
| Column 3 | Enter the number of approved REDUCED children’s applications on file |
| Column 4 | Enter the day of the month |
| Column 5 | Enter the number of meals served to paid children |
| Column 6 | Enter the number of meals served to children who have been approved for free meals |
| Column 7 | Enter the number of meals served to children who have been approved for reduced price meals |
| Column 8 | Enter the sum total of columns 5, 6, and 7 |
| Column 9 | Justification is needed here if any of the comparisons exceed the numbers eligible or when compared against the attendance factor. |

How to Calculate the Average per Meal Food Cost for a Breakfast and a Lunch

For a complete cycle of menus (no less than 14 days) calculate the food cost for each breakfast and lunch. The cost per serving for each item in the menu would be calculated by dividing the per unit purchase price of an item by the number of servings obtained per purchase unit.

Example: 24 servings of fruit from a can costing \$2.40 would give a cost per serving of \$0.10.

Example of one day:

| <u>Breakfast</u> | | <u>Lunch</u> | |
|------------------|-------------|--------------|-------------|
| Milk | \$0.18 | Milk | \$0.18 |
| Juice | 0.20 | Fruit | 0.20 |
| Cereal | <u>0.33</u> | Vegetable | 0.20 |
| | \$0.71 | Bread | 0.15 |
| | | Main Dish | 0.50 |
| | | Dessert | <u>0.17</u> |
| | | | \$1.40 |

Add the cost of each breakfast (at least 14 days) together and divide the total by the number of days to get the average cost per breakfast. Do the same for lunches.

Appendix N

Refrigerator 35°F – 45°F

Freezer $-10^{\circ}\text{F} - 0^{\circ}\text{F}$

Dry Storage 50⁰F – 70⁰F

| | |
|-----------------------------------|-------------|
| Name of Recipient: | Month/Year: |
| Location of Freezer/Refrigerator: | |

[illegible]